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CTIA

Building The Wireless Future™
Cellular Telecommunications Industry Association

July 14, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
12th Street Lobby, TW-A325
Washington, DC 20554

> *Re:* **Ex Parte *Presentation***
> **CC Docket No. 92-105**

Dear Ms. Salas:

On July 13, 2000, the Cellular Telecommunications Industry Association ("CTIA") represented by Randall Coleman, Vice President for Regulatory Policy and Law, Andrea Williams, Assistant General Counsel, and Rick Kemper, Director of Secure Systems met with Adam Krinsky, Legal Advisor, to Commissioner Tristani and Sarah Whitesell, Legal Advisor to Commissioner Tristani. The parties discussed CMRS industry implementation of 711 for TRS. Specifically, the technical and operational challenges the CMRS industry are encountering. CTIA's position is set forth in the written ex parte submission attached hereto.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter is being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Dustun L. Ashton

Attachment(s)

No. of Copies rec'd _O+1_
List A B C D E

NATIONWIDE IMPLEMENTATION OF "7-1-1" CODE FOR TELECOMMUNICATIONS RELAY SERVICES

Preliminary Analysis of the Technical and Operational Challenges faced by Wireless Carriers

CTIA supports the nationwide use of the 7-1-1 code for access to TRS. The FCC's implementation of nationwide 7-1-1 access to TRS must take into account the differences between wireline and wireless services.

Wireless carriers can "translate" 7-1-1 to any seven or ten digit numbers. The challenge is not in the translation but in the routing of the call. Routing of the call requires an intense coordination of efforts between the wireless carriers, TRS centers, as well as consumer education. CTIA's preliminary analysis indicates there are some unique challenges posed by the multi-state nature of CMRS service areas, roaming, billing and statutory requirements. Preliminary discussions with several CTIA members that are in the process of implementing 7-1-1 indicate that the more features included in 7-1-1 TRS services, the more complexities added to implementing 7-1-1 TRS.

Major Challenges:

Call Routing

- **Cross border issue** - CMRS service areas often transcend state geopolitical boundaries. Wireless systems are configured based on their licensed coverage areas, which often do not coincide with state or LATA boundaries. In a wireless environment, calls are routinely routed based on the physical location of the caller. The call is routed to the nearest switch, which may or may not be located within the same state as the caller. This can be complicated further as the caller moves from cell sector to cell sector and the call is handed off from switches across several regions or states.

- **Roaming** - A wireless caller roaming outside its home territory would be routed to the 711 Relay Center serving the caller's physical location, assuming 711 is offered in the physical location, rather than the caller's home location. Thus, an intrastate TRS Center in the caller's physical location must be willing to handle the call.

- **TRS Centers' Identifying a Wireless Call** - When a wireless call is routed to a local TRS center, the TRS center often cannot identify the call as a wireless call. Very often the call is identified as a call from outside the state, *i.e.*, passing the switch ANI or handset ANI. Thus, wireless TRS users are often identified as *out of state calls* when in fact they are local.

Billing

At this time. many wireless billing systems are not configured for billing TRS calls. With one-rate plans, buckets of minutes, and free minutes rate plans, wireless customers do not pay for long distance calls. Billing systems are not set up for TRS centers to credit a wireless TRS user in accordance with his or her wireless rate plan.

State-by-State Implementation

For carriers with a nationwide or regional footprint, there is concern that state-by-state implementation plans for implementing 7-1-1/TRS may result in inconsistent requirements. Furthermore, piece-meal deployment is not conducive to providing quality customer service in a competitive environment.

Presubscription to Preferred Long Distance Carrier

The Telecommunications Act of 1996 relieved CMRS carriers from equal access requirements. Thus, CMRS carriers no longer offer customers, including TRS customers, access to their preferred long distance carrier. Any FCC rule or policy that requires wireless carriers to provide a subset of their customers with presubscription to a particular long distance carrier, even for the limited purpose of facilitating nationwide 7-1-1 access to TRS, contravenes the Act.

Other Issues

Reclaiming 7-1-1 - some carriers still use 7-1-1 for vanity services, *e.g.*, weather and traffic reports, radio station news, customer service for subscribers roaming, etc. In these situations, the carrier will have to reassign 7-1-1 to TRS and designate other abbreviated dialing codes for vanity services.

Several Preliminary Suggestions

- Allow wireless carriers flexibility rather than micro-manage implementation of 7-1-1 for TRS. A few suggested approaches:

- Translating 7-1-1 to a single statewide 800 number for the state contracted intrastate provider of TRS. A customer dialing 7-1-1 in a bordering state and served by facilities located in the state may be connected to the state TRS center. The state TRS center, however, must have the authority, infrastructure and resources to handle such calls or transfer them accordingly.

- Allow wireless carriers to send their TRS calls to one national or regional TRS center or relay service provider, depending on carrier's traffic of TRS calls. While this may require time to develop appropriate customer database, it is the least expensive for TRS centers and carriers, and avoid jurisdictional issues.

Additional Information Needed:

- Reasonable implementation period
- The capability of TRS centers to identify wireless calls and route accordingly

Other TRS Issues

PROPOSED DEFINITION OF "FUNCTIONAL EQUIVALENCE"

- CTIA supports the concept of "functional equivalence" between *wireless* TRS calls and *wireless* non-TRS calls.
- Proposed definition does not recognize the differences between wireless and wireline calls with respect to "equal costs to consumers" and "choice of carriers by all types of toll calls."
- The term, "equal costs to consumers" assumes wireline fixed-rate model. Does not take into account the flexible and varied rate plans offered by wireless carriers.
- **CTIA recommendation:** Definition of "functional equivalence" whereby wireless TRS users have an opportunity to select rate plans equivalent to the type of rate plans made available to wireless non-TRS users.

OPENING UP THE SS7 SIGNALING SYSTEM TO TRS CENTERS

- Not all common carriers use SS7 technology to transfer subscriber information from one common carrier to another common carrier.
    - ➤ Example: Rather than support SS7 connectivity, a CMRS carrier will use in-band signaling for interconnection and use X.25 signaling to send data.

- Availability of SS7 depends on the capability of the TRS Center to connect and accept delivery of SS7 Data
    - ➤ Require extensive modifications to the TRS network architecture
    - ➤ Impose significant capital costs on TRS centers
      Estimate: Sprint Relay - $25 million or more

- Proposed approach is excessive, particularly when other viable and less costly alternatives are available.
    - ➤ Much of the needed data already available over Feature Group D Trunks and can be accessed through off-the-shelf equipment and software (*Bell Atlantic*)
    - ➤ Other viable alternatives - X.25 signaling, ISDN and NCAS (*CTIA*)

- Mistaken assumption that access to SS7 technology will resolve issues related to Caller ID service and manual collection of subscriber information by TRS centers

- Significant security risks
    - ➤ Data associated with the various wireless anti-fraud technologies, *e.g.*, RF fingerprinting, PINs, authentication, roamer verfication, are sent between wireless networks using SS7 technology.
    - ➤ The greater the scope of access = the greater the security risk